## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

BRAVADO INTERNATIONAL GROUP MERCHANDISING SERVICES, INC.,	
Plaintiff,	) CIVIL ACTION NO. 1:20-cv-10489 RWZ
vs.	) )
JOHN DOES 1-100, JANE DOES 1-100, and XYZ COMPANY,	, ) )
Defendants.	) ) )

## STATUS REPORT

Plaintiff Bravado International Group Merchandising Services, Inc. ("Plaintiff") submits this Status Report to advise the Court of the status of this matter.

This Court previous issued a Temporary Restraining Order, Seizure Order and an Order to Show Cause Why A Preliminary Injunction Should Not Issue to enjoin and restrain Defendants, commonly known as "Bootleggers," from manufacturing, selling or distributing merchandise, also known as "Infringing Merchandise" bearing the federally registered trademarks, service marks, likenesses, logos and other indicia for the artist "BILLIE EILISH" (the "Artist") and to seize the Infringing Merchandise. The Order to Show Cause Regarding Why a Preliminary Injunction and Seizure Order Should Not Issue hearing (the "Order to Show Cause Hearing") was scheduled for March 31, 2020. The required bond was (and remains) posted with the Court.

Due to the extraordinary circumstances related to the COVID-19 virus, virtually all cities banned gatherings of people for concerts. Accordingly, the Artist's concerts were postponed, including the Boston TD Garden concert and the Order to Show Cause Hearing

Noted. As requested the matter is continued and comments on or before January 31, 2022. Rand Zobel.) 7/9/21

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was taken off calendar. Moreover, as a further consequence of the extraordinary circumstances, many court hearings, trials, etc. were and have been continued, causing a strain to the Federal Court system.

The Artist's concerts have been rescheduled and will start in February of 2022, with the TD Garden Boston, Massachusetts concert to take place on February 20, 2022. Plaintiff respectfully requests that this matter be continued, and that it be permitted to file prior to the TD Garden concert a new motion for a Temporary Restraining Order, Seizure Order, etc. Plaintiff requests this in good faith, since this Court is familiar with the matter, including previously finding that Defendant infringers will sell their unlawful merchandise at the Artist's concerts.

Dated: July 15, 2021

Respectfully Submitted **BRAVADO INTERNATIONAL GROUP** MERCHANDISING SERVICES, INC. By Its Attorneys /s/ M. Lawrence Oliverio M. Lawrence Oliverio, Esq., BBO #378755 loliverio@polsinelli.com Polsinelli, PC One International Plaza, Ste 3900 Boston, MA 02110 Tel: (617) 406-0335; Fax: (617) 367-4656

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